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*Counsel for Mizuho Bank, Ltd., in its capacity
as HoldCo Term Loan Administrative Agent*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION
-and-
PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

*All papers shall be filed in the Lead Case, No. 19-30088 (DM).

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF CROSS-MOTION OF
MIZUHO BANK, LTD., IN ITS
CAPACITY AS HOLDCO TERM LOAN
ADMINISTRATIVE AGENT FOR LEAVE
TO APPEAL ORDER REGARDING
POSTPETITION INTEREST**

Date: TBD
Time: TBD
Judge: TBD

Objection Deadline: March 11, 2020

1 **PLEASE TAKE NOTICE** that on January 29, 2019, PG&E Corporation and Pacific Gas
2 and Electric Company, as debtors and debtors in possession (collectively, the “Debtors”), in the
3 above-captioned chapter 11 cases, each filed a voluntary petition for relief under chapter 11 of title
4 11 of the United States Code with the United States Bankruptcy Court for the Northern District of
5 California (San Francisco Division) (the “Bankruptcy Court”).

6 **PLEASE TAKE FURTHER NOTICE** that, pursuant to 28 U.S.C. § 158(a)(3) and
7 Federal Rule of Bankruptcy Procedure 8004(b)(2), Mizuho Bank, Ltd., solely in its capacity as
8 HoldCo Term Loan Administrative Agent (“Mizuho”) filed the *Cross-Motion of Mizuho Bank,*
9 *Ltd., in its capacity as HoldCo Term Loan Administrative Agent for Leave to Appeal Order*
10 *Regarding Postpetition Interest* (the “Cross-Motion”). The Cross-Motion accompanies Mizuho’s
11 *Notice of Appeal and Statement of Election to Have Appeal Heard by District Court* (the “Notice
12 of Appeal”), this notice of the Cross-Motion, and all the papers and record on file in this action.

13
14 **PLEASE TAKE FURTHER NOTICE** that the Cross-Motion may be heard by the United
15 States District Court of the Northern District of California (the “District Court”) at a date and time
16 to be set by the District Court. Pursuant to Federal Rule of Bankruptcy Procedure 8004(c)(3),
17 however, any relief requested in the Cross-Motion may be granted without a hearing.

18 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Federal Bankruptcy Rule of
19 Procedure 8004(b)(2) and 8013, any oppositions or responses to the Cross-Motion must be in
20 writing, filed with the District Court, and served on counsel for Mizuho so as to be received by no
21 later than **March 11, 2020**. Any oppositions or responses must also be filed and served on all the
22 parties reflected in the Notice of Appeal.

23
24 **PLEASE TAKE FURTHER NOTICE** that copies of the Cross-Motion and its supporting
25 papers can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at
26 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
27 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
28

1 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
2 U.S.-based parties; or +1 (929) 333-8977 for international parties or by email at:
3 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
4 Bankruptcy Court's website.

5
6 Dated: March 4, 2020

STROOCK & STROOCK & LAVAN LLP

7
8 By: /s/ David W. Moon

David W. Moon

9 Kenneth Pasquale (*admitted pro hac vice*)

10 *Counsel for Mizuho Bank, Ltd., in its capacity as*
11 *HoldCo Term Loan Administrative Agent*